

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5

6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 APPLIES TO ALL CASES : NO.
10 : 1:17-MD-2804
11 :
12 - HIGHLY CONFIDENTIAL -
13 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
14 - - -
15 January 17, 2019
16 - - -
17 Videotaped deposition of
18 GABRIEL WEISSMAN, taken pursuant to
19 notice, was held at the law offices of
20 Reed Smith, LLP, 1717 Arch Street,
21 Philadelphia, Pennsylvania, beginning at
22 10:00 a.m., on the above date, before
23 Michelle L. Gray, a Registered
24 Professional Reporter, Certified
Shorthand Reporter, Certified Realtime
Reporter, and Notary Public.

21 - - -
22 GOLKOW LITIGATION SERVICES
23 877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com

<p style="text-align: right;">Page 82</p> <p>1 form.</p> <p>2 THE WITNESS: I'm not sure.</p> <p>3 BY MS. HUGHES:</p> <p>4 Q. Why would you have put it in 5 there?</p> <p>6 A. I'm not sure why I would 7 have written that when drafting this.</p> <p>8 Q. Did you --</p> <p>9 MS. McCLURE: Are you 10 finished with that document?</p> <p>11 MS. HUGHES: Yes.</p> <p>12 MS. McCLURE: Okay. Is 13 there a time when we can take a 14 break?</p> <p>15 MS. HUGHES: Yeah. Let me 16 just ask a couple more questions, 17 and we'll take a break.</p> <p>18 BY MS. HUGHES:</p> <p>19 Q. All right. You can put that 20 document to the side.</p> <p>21 Did you draft other press 22 releases for Bob Mauch's signature in the 23 context of the opioid crisis?</p> <p>24 A. I don't believe I drafted</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Were they both related to 2 opioids?</p> <p>3 A. The pieces that I'm thinking 4 about right now were, yes.</p> <p>5 Q. Do you remember the 6 substantive -- the substance of those 7 pieces?</p> <p>8 A. I don't remember the full 9 substance off the top of my head.</p> <p>10 MS. HUGHES: All right. We 11 can take a break.</p> <p>12 THE VIDEOGRAPHER: Going off 13 the record at 11:11 a.m.</p> <p>14 (Short break.)</p> <p>15 THE VIDEOGRAPHER: We are 16 back on the record at 11:34.</p> <p>17 BY MS. HUGHES:</p> <p>18 Q. Mr. Weissman, I know we took 19 a quick break. Do you still understand 20 that you're under oath?</p> <p>21 A. I do.</p> <p>22 Q. So we had been previously 23 talking about, you said that you had done 24 an op-ed piece for your own byline,</p>
<p style="text-align: right;">Page 83</p> <p>1 press releases for Bob Mauch's signature.</p> <p>2 Q. What about opinion pieces?</p> <p>3 A. I'm not sure if I've drafted 4 other ones.</p> <p>5 Q. Have you drafted opinion 6 pieces for other AmerisourceBergen 7 executives or associates related to the 8 opioid crisis?</p> <p>9 A. I've participated in the 10 drafting of opinion pieces.</p> <p>11 Q. Do you remember what those 12 are?</p> <p>13 A. Yes. I remember -- I 14 remember some, yeah.</p> <p>15 Q. What are those?</p> <p>16 A. I participated in the 17 drafting of an opinion piece under my own 18 byline, and I participated in the 19 drafting of an opinion piece under Steve 20 Collis' byline as well.</p> <p>21 Q. Do you remember what the 22 names of those opinion pieces were?</p> <p>23 A. I don't remember the names 24 off the top of my head.</p>	<p style="text-align: right;">Page 85</p> <p>1 right? Is that the correct terminology?</p> <p>2 A. Yes.</p> <p>3 Q. Did that piece run in the 4 Cincinnati Inquirer? Do you know?</p> <p>5 A. I believe it did.</p> <p>6 (Document marked for 7 identification as Exhibit 8 ABDC-Weissman-3.)</p> <p>9 BY MS. HUGHES:</p> <p>10 Q. All right. Mr. Weissman, 11 I'm handing you what's being marked as 12 Exhibit 3, the Bates stamp is 13 HDA_MDL_000013885. This is a document 14 that we got permission for from HDA 15 counsel.</p> <p>16 A. Thank you.</p> <p>17 Q. If you'll just let me know 18 when you're done reviewing that.</p> <p>19 A. Thanks.</p> <p>20 Okay. Thank you.</p> <p>21 Q. Mr. Weissman, if you'll look 22 at Page 2 of this e-mail, last Bates 23 numbers are 86. You'll see two-thirds of 24 the way through on August 22nd, 2017,</p>